

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DEBORAH BOYD,  
PLAINTIFF

V.

CIVIL ACTION NO. 05-11434-RGS

U.S. DEPARTMENT OF HEALTH  
AND HUMAN SERVICES, YOUNG  
BAE KIM, M.D. and BETH ISRAEL  
DEACONESS MEDICAL CENTER,  
DEFENDANTS

REQUEST OF DEFENDANTS, YOUNG BAE KIM, M.D. AND BETH ISRAEL  
DEACONESS MEDICAL CENTER, FOR A MEDICAL MALPRACTICE  
TRIBUNAL PURSUANT TO CHAPTER 231, §60B

Pursuant to G.L., Ch. 231, Sec. 60B (Chapter 362 of the Acts of 1975), it is requested that a tribunal be convened within 15 days to afford the plaintiffs an opportunity to present an offer of proof and substantiating evidence sufficient to raise a legitimate question of liability appropriate for judicial inquiry. Dr. Kim is a board certified obstetrician/gynecologist.

DEFENDANTS,  
By their Attorneys,  
DUNN AND DUNN

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Vincent P. Dunn  
BBO# 551034  
One Union Street  
Boston, MA 02108  
(617) 523-2950

DATED: November 23, 2005

CERTIFICATE OF SERVICE

I, Vincent P. Dunn, attorney of record for the Defendants Kim and BIDMC, do hereby certify that copies of the foregoing were this day forwarded by first class mail, postage prepaid, to counsel of record as follows: Christopher Timson, Esq., Howard, Timson & White, 89 Access Road, Suite 29, Norwood, MA 02062.

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Vincent P. Dunn  
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